

EXHIBIT B

Proposed Order Granting Emergency Hearing Request

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Three Arrows Capital LTD,¹

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 22-10920 (MG)

ORDER GRANTING REQUEST FOR EMERGENCY HEARING

Upon the *Emergency Motion for Provisional Relief* (the “**Motion**”),² filed on July 8, 2022 by the duly authorized Foreign Representatives of the Debtor, and it appearing necessary that the Motion be heard on an emergency basis, after due deliberation and cause shown,

IT IS HEREBY ORDERED THAT:

1. The request for an emergency hearing on the Motion is granted as set forth herein.
2. A hearing on the Motion is scheduled for July 12, 2022 at 9:00 a.m. prevailing Eastern Time) (the “Hearing Date”) before the Honorable Martin Glenn of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004.
3. In accordance with General Order M-543, dated March 20, 2020 (Morris, C.J.), a copy of which may be viewed on the Court’s website at <http://www.nysb.uscourts.gov/sites/default/files/m543.pdf>, the hearing (the “Hearing”) will be conducted by telephonic means through Zoom for Government® videoconference. Parties wishing to participate in the Hearing are required to register their eCourtAppearance by 4:00 p.m.

¹ The last four digits of the Debtor’s British Virgin Islands company registration number are 0531. The location of the Debtor’s registered office is ABM Chambers, P.O. Box 2283, Road Town, Tortola, VG1110, British Virgin Islands.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

(prevailing Eastern Time) the day before the Hearing at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

4. The form of Notice attached hereto as Exhibit 1 is approved.

5. Prior to serving the Notice or causing it to be served, the Foreign Representatives may insert any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provisions of this Order and make such other and further non-material, non-substantive changes as the Foreign Representatives deem necessary or appropriate.

6. Objections to the Motion are permitted up to Hearing Date and may be submitted orally during the course of the hearing on the Motion.

7. The Foreign Representatives are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. The Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order

Dated: New York, New York
_____, 2022

THE HONORABLE MARTIN GLENN
CHIEF UNITED STATES BANKRUPTCY
JUDGE

Exhibit 1

Notice of Emergency Hearing on Motion for Provisional Relief

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Three Arrows Capital, Ltd.,¹

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 22-10920 (MG)

**NOTICE OF FILING AND HEARING ON EMERGENCY MOTION FOR
PROVISIONAL RELIEF PURSUANT TO CHAPTER 15 OF THE UNITED STATES
BANKRUPTCY CODE**

PLEASE TAKE NOTICE that on July 8, 2022, Russell Crumpler and Christopher Farmer, in their joint capacities as the duly authorized foreign representatives (the “Foreign Representatives”) of Three Arrows Capital, Ltd (the “Debtor”) filed the *Emergency Motion for Provisional Relief* (the “Motion”)² pursuant to chapter 15 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that the Foreign Representatives seek, on an emergency basis, the entry of an order granting provisional relief (a) entrusting the administration and realization of the Debtor’s assets located in the United States to the Foreign Representatives; (b) suspending the right to transfer, encumber or otherwise dispose of any assets of the Debtor subject to further order of the Court; (c) authorizing the issuance of, and directing compliance with, subpoenas on (i) the Founders for the production of documents and depositions substantially in the form attached to the Motion as Exhibit C, and (ii) any other persons or entities that the Foreign Representatives reasonably determine during the course of their investigation may have information relevant to the Debtor, its affairs, or its assets, in form and substance substantially similar to the form attach to the Motion as Exhibit C or Exhibit D, as applicable; (d) waiving the 14-day stay of effectiveness of the Order; and (e) granting related relief.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing (the “Hearing”) to consider the relief requested in the Motion for **9:00 a.m (prevailing Eastern Time) on July 12, 2022** before the Honorable Martin Glenn of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE, in accordance with General Order M-543, dated March 20, 2020 (Morris, C.J.), a copy of which may be viewed on the Court’s website at

¹ The last four digits of the Debtor’s British Virgin Islands company registration number are 0531. The location of the Debtor’s registered office is ABM Chambers, P.O. Box 2283, Road Town, Tortola, VG1110, British Virgin Islands.

² Capitalized terms shall have the same meanings ascribed to them in the Motion.

<http://www.nysb.uscourts.gov/sites/default/files/m543.pdf>, the this hearing (the “Hearing”) will be conducted by telephonic means through Zoom for Government® videoconference. Parties wishing to participate in the Hearing are required to register their eCourtAppearance by 4:00 p.m. (prevailing Eastern Time) the day before the Hearing at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and all documents filed in the chapter 15 case are available to parties in interest on the Court’s Electronic Case Filing System, which can be accessed from (a) the Court’s website at <http://www.nysb.uscourts.gov> (a PACER login and password are required to retrieve a document), or (b) upon written request to the Foreign Representatives’ counsel (including by facsimile or e-mail) addressed to:

Adam J. Goldberg
Brett M. Neve (admitted *pro hac vice*)
Nacif Taousse
Brian S. Rosen (admitted *pro hac vice*)
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
Email: adam.goldberg@lw.com
brett.neve@lw.com
nacif.taousse@lw.com
brian.rosen@lw.com

Daniel Scott Schecter (admitted *pro hac vice*)
Nima H. Mohebbi (admitted *pro hac vice*)
Caitlin J. Campbell (admitted *pro hac vice*)
LATHAM & WATKINS LLP
355 South Grand Avenue, Suite 100
Los Angeles, CA 90071
Telephone: (213) 485-1234
Facsimile: (213) 891-8763
Email: daniel.schecter@lw.com
nima.mohebbi@lw.com
caitlin.campbell@lw.com

A copy of select pleadings filed in the chapter 15 case are available for review, free-of-charge, on the website maintained by the Foreign Representatives: <https://3acliquidation.com/>.

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the relief requested by the Motion is permitted to do so any time before or during the hearing. Any written responses of objections to the relief requested by the Motion shall be in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, and shall set

forth the basis for such response or objection with specificity and the nature and extent of the respondent's claims against the Debtor. Any such written responses or objections shall be filed electronically with the Court by registered users of the Court's electronic case filing system in accordance with General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at <http://www.nysb.uscourts.gov>) and by all other parties in interest, on a compact disc in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format, which disc shall be sent to the Office of the Clerk of the Court, One Bowling Green, New York, New York 10004-1408. A hard copy of any written response or objection shall be sent to the Chambers of the Honorable Martin Glenn, Chief United States Bankruptcy Judge, One Bowling Green, New York, New York 10004-1408 and served upon counsel for the Foreign Representatives, Latham & Watkins LLP, 1271 Avenue of the Americas, New York, New York 10020 (Attn.: Adam J. Goldberg, Brett M. Neve, Nacif Taousse, and Brian S. Rosen), and Latham & Watkins LLP, 355 South Grand Avenue, Suite 100, Los Angeles, CA 90071 (Attn.: Daniel Scott Schecter, Nima H. Mohebbi, and Caitlin J. Campbell).

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the relief requested by the Motion must appear at the Hearing at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

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Dated: July 8, 2022
New York, New York

Respectfully submitted,

/s/ Adam J. Goldberg

Adam J. Goldberg

Brett M. Neve (admitted *pro hac vice*)

Nacif Taousse

Brian S. Rosen (admitted *pro hac vice*)

LATHAM & WATKINS LLP

1271 Avenue of the Americas

New York, NY 10020

Telephone: (212) 906-1200

Facsimile: (212) 751-4864

Email: adam.goldberg@lw.com

brett.neve@lw.com

nacif.taousse@lw.com

brian.rosen@lw.com

– and –

Daniel Scott Schecter (admitted *pro hac vice*)

Nima H. Mohebbi (admitted *pro hac vice*)

Caitlin J. Campbell (admitted *pro hac vice*)

LATHAM & WATKINS LLP

355 South Grand Avenue, Suite 100

Los Angeles, CA 90071

Telephone: (213) 485-1234

Facsimile: (213) 891-8763

Email: daniel.schecter@lw.com

nima.mohebbi@lw.com

caitlin.campbell@lw.com

Counsel to the Foreign Representatives